UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA **NEWPORT NEWS DIVISION**

JACK P. DeJESUS,

Plaintiff,

v.

Civil Action No. 4:23-cv-158

WILLIAM J. BURNS, Director, Central Intelligence Agency,

Defendant.

NOTICE OF FILING

The PCRB having on July 12, 2024, approved the filing of Plaintiff's Complaint as originally drafted, with the exception of the substitution of a pseudonym for Plaintiff's true name, Plaintiff herewith files his Complaint pursuant to the Order of this Court, Docket No. 23.

Dated: July 19, 2024 Respectfully submitted,

> /s/ LENORE C. GARON LENORE C. GARON VSB #39934 2412 Falls Place Court Falls Church, VA 22043 Phone: 703-534-6662 Fax: 703-534-4448

lenore@lenorecgaron.com

DANIEL K. GEBHARDT DC Bar #975703 ARIEL E. SOLOMON NY Bar #513354 WILLIAM C. SMITH, JR. MD Bar #1106150245 Solomon Law Firm, PLLC 1025 Connecticut Avenue, N.W. **Suite 1000** Washington, DC 20036

Phone: 866-833-3529 Fax: 202-688-1896

dgebhardt@fedemploylaw.com

asolomon@fedemploylaw.com wsmith@fedemploylaw.com Admitted pro hac vice

Attorneys for Plaintiff